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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SHAWN WALKER,

Plaintiff,

v.

EQUIFAX INFORMATION SERVICES,
LLC; EXPERIAN INFORMATION
SOLUTIONS, INC.; TRANS UNION, LLC;
ALLY FINANCIAL, INC.; CAPITAL ONE
SERVICES, LLC; 1ST UNITED CREDIT
UNION; BANK OF AMERICA, N.A.;
CARMAX AUTO SUPERSTORES, INC.,
JPMORGAN CHASE BANK, N.S.;
CORELOGIC CREDCO, LLC; TD AUTO
FINANCE, LLC,

Defendants.

Case No. 2:22-CV-01338-RFB-VCF

**UNOPPOSED MOTION TO EXTEND
TIME TO RESPOND TO PLAINTIFF'S
FIRST AMENDED COMPLAINT**

(First Request)

Defendant Bank of America N.A. ("BANA") by and through its undersigned counsel of record, hereby submits the following Unopposed Motion to Extend Time to Respond to Plaintiff's First Amended Complaint (First Request):

On August 17, 2022, Plaintiff filed his original Complaint [ECF No. 1]. The Summons to Defendants was issued on August 17, 2022 [ECF No. 3]. On September 1, 2022, Plaintiff sent BANA a request to waive service of summons [ECF No. 6]. BANA executed the waiver of service,

1 which made the initial deadline to respond to the original Complaint October 31, 2022 [ECF No.
2 6].

3 On October 26, 2022, Plaintiff filed his First Amended Complaint [ECF No. 53]. Pursuant
4 to Fed. R. Civ. P. 15(a)(3) the current deadline to respond is November 9, 2022.

5 BANA's counsel is still investigating the allegations raised in Plaintiff's original
6 Complaint and First Amended Complaint. Further, Plaintiff and BANA have discussed extending
7 the deadline to November 30, 2022, in order to continue to explore early resolution opportunities.
8 On October 27, 2022, BANA received approval from Plaintiff's counsel to make the response due
9 November 30, 2022.

10 Based upon the foregoing, BANA respectfully requests that the Court extend the deadline
11 for BANA to file its response to Plaintiff's First Amended Complaint to November 30, 2022. This
12 is the first request for extension of time for BANA to respond to Plaintiff's First Amended
13 Complaint. The extension is requested in good faith and is not for purposes of delay or prejudice
14 to any other party.

15 Dated this 27th day of October, 2022.

16 WRIGHT, FINLAY & ZAK, LLP

17 /s/ Jory C. Garabedian

18 Darren T. Brenner, Esq.

19 Nevada Bar No. 8386

20 Jory C. Garabedian, Esq.

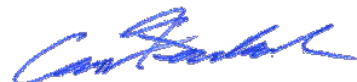
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22 Las Vegas, Nevada 89117

Attorneys for Bank of America, N.A.

23
24 **IT IS SO ORDERED:**

25 

26 UNITED STATES MAGISTRATE JUDGE

27 DATED: 10-31-2022

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 27, 2022, and pursuant to Fed. R. Civ. P. 5(b), I served via the CM/ECF electronic filing system a true and correct copy of the foregoing **UNOPPOSED MOTION TO EXTEND TIME TO RESPOND TO PLAINTIFF'S FIRST AMENDED COMPLAINT** to the parties below:

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/s/ Tonya Sessions

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